

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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VICTOR CAMPOS
*on behalf of himself, FLSA Collective
Plaintiffs and the Class,*

Plaintiffs,

-against-

LENMAR RESTAURANT INC. d/b/a
PIETRO'S and WILLIAM BRUCKMAN,

Defendants.

Case No.: 18 CV 12359

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OFFER OF JUDGMENT

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants LENMAR RESTAURANT INC. d/b/a PIETRO'S and WILLIAM BRUCKMAN (collectively, "Defendants") hereby offer to allow judgment to be taken against them, jointly and severally, in the sum of Seventeen Thousand Five Hundred Dollars (\$17,500.00), inclusive of all of Plaintiffs VICTOR CAMPOS and TOMISLAV MIHATOV's wage and hour claims for relief, damages, fees, costs, and expenses, including but not limited to any claim of entitlement to recover legal fees and costs.

This Offer of Judgment is made for the purposes specified in Federal Rule of Civil Procedure 68, and neither this Offer of Judgment nor any judgment that may result from this Offer of Judgment shall be construed as either an admission of liability on the part of Defendants, or any of them, or that Plaintiffs have suffered any damages.

This Offer of Judgment is made pursuant to the provisions of Rule 68 of the Federal Rules of Civil Procedure, and shall be deemed withdrawn unless Plaintiffs VICTOR CAMPOS and TOMISLAV MIHATOV serve written notice of their acceptance within fourteen (14) days

of the date on which this Offer of Judgment was served. Any evidence of this Offer of Judgment shall be inadmissible.

Dated: White Plains, New York

November 5, 2020

ECKERT SEAMANS CHERIN &
MELLOTT, LLC



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